

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

THE UNITED STATES OF AMERICA  
*ex rel.* JULIE LONG,

Plaintiffs,

V.

JANSSEN BIOTECH, INC.,

Defendant.

Civil Action No.  
16-12182-FDS

LEAVE TO FILE UNDER SEAL  
GRANTED ON DEC. 7, 2021

**EXHIBIT 3**  
**TO**  
**PLAINTIFF’S MEMORANDUM OF LAW IN SUPPORT OF**  
**MOTION TO COMPEL THE PRODUCTION OF DOCUMENTS**  
**AND A COMPLETE AND PROPER PRIVILEGE LOG (ECF NO. 224)**

1 of 13

Privilege Log Number	Start Dates	End Dates	Withheld or Redacted	Redaction Extension	Content/Subject	Author	Category	Participants	To	From	CC	BCC	Permitted	Purpose and Subject of Communication
JANSEN-BP-01-00001			Withheld	docx	Shahmer Scott	Shahmer Scott	Attorney-Client	Flash Panthea	Shahmer Scott					Memorandum providing information to counsel for the purpose of receiving legal advice regarding preparation/review of internal guidance concerning practice management or IDJ support.
JANSEN-BP-01-00002			Withheld	docx	Shahmer Scott	Shahmer Scott	Attorney-Client	Flash Panthea	Shahmer Scott					Memorandum providing information to counsel for the purpose of receiving legal advice regarding preparation/review of internal guidance concerning practice management or IDJ support.
JANSEN-BP-01-00003			Withheld	pdf	Shahmer Scott	Shahmer Scott	Attorney-Client	Marian Jeremy	Shahmer Scott					Memorandum providing information to counsel for the purpose of receiving legal advice regarding preparation/review of internal guidance concerning practice management or IDJ support.
JANSEN-BP-01-00004			Withheld	email	Shahmer Scott	Shahmer Scott	Attorney-Client	Marian Jeremy	Shahmer Scott					Memorandum providing information to counsel for the purpose of receiving legal advice regarding preparation/review of internal guidance concerning practice management or IDJ support.
JANSEN-BP-01-00005			Withheld	pdf	Shahmer Scott	Shahmer Scott	Attorney-Client	Marian Jeremy	Shahmer Scott					Memorandum providing information to counsel for the purpose of receiving legal advice regarding preparation/review of internal guidance concerning practice management or IDJ support.
JANSEN-BP-01-00006			Withheld	docx	Shahmer Scott	Shahmer Scott	Attorney-Client	Flash Panthea	Shahmer Scott					Memorandum providing information to counsel for the purpose of receiving legal advice regarding preparation/review of internal guidance concerning practice management or IDJ support.
JANSEN-BP-01-00007			Withheld	docx	Shahmer Scott	Shahmer Scott	Attorney-Client	Flash Panthea	Shahmer Scott					Memorandum providing information to counsel for the purpose of receiving legal advice regarding preparation/review of internal guidance concerning practice management or IDJ support.
JANSEN-BP-01-00008			Withheld	docx	Shahmer Scott	Shahmer Scott	Attorney-Client	Flash Panthea	Shahmer Scott					Memorandum providing information to counsel for the purpose of receiving legal advice regarding preparation/review of internal guidance concerning practice management or IDJ support.
JANSEN-BP-01-00009			Withheld	docx	Shahmer Scott	Shahmer Scott	Attorney-Client	Flash Panthea	Shahmer Scott					Memorandum providing information to counsel for the purpose of receiving legal advice regarding preparation/review of internal guidance concerning practice management or IDJ support.
JANSEN-BP-01-00010			Withheld	docx	Shahmer Scott	Shahmer Scott	Attorney-Client	Flash Panthea	Shahmer Scott					Memorandum providing information to counsel for the purpose of receiving legal advice regarding preparation/review of internal guidance concerning practice management or IDJ support.
JANSEN-BP-01-00011			Withheld	docx	Shahmer Scott	Shahmer Scott	Attorney-Client	Flash Panthea	Shahmer Scott					Memorandum providing information to counsel for the purpose of receiving legal advice regarding preparation/review of internal guidance concerning practice management or IDJ support.
JANSEN-BP-01-00012			Withheld	docx	Shahmer Scott	Shahmer Scott	Attorney-Client	Flash Panthea	Shahmer Scott					Memorandum providing information to counsel for the purpose of receiving legal advice regarding preparation/review of internal guidance concerning practice management or IDJ support.
JANSEN-BP-01-00013			Withheld	docx	Shahmer Scott	Shahmer Scott	Attorney-Client	Flash Panthea	Shahmer Scott					Memorandum providing information to counsel for the purpose of receiving legal advice regarding preparation/review of internal guidance concerning practice management or IDJ support.
JANSEN-BP-01-00014			Withheld	docx	Shahmer Scott	Shahmer Scott	Attorney-Client	Flash Panthea	Shahmer Scott					Memorandum providing information to counsel for the purpose of receiving legal advice regarding preparation/review of internal guidance concerning practice management or IDJ support.
JANSEN-BP-01-00015			Withheld	docx	Shahmer Scott	Shahmer Scott	Attorney-Client	Flash Panthea	Shahmer Scott					Memorandum providing information to counsel for the purpose of receiving legal advice regarding preparation/review of internal guidance concerning practice management or IDJ support.
JANSEN-BP-01-00016			Withheld	docx	Shahmer Scott	Shahmer Scott	Attorney-Client	Flash Panthea	Shahmer Scott					Memorandum providing information to counsel for the purpose of receiving legal advice regarding preparation/review of internal guidance concerning practice management or IDJ support.
JANSEN-BP-01-00017			Withheld	email	Shahmer Scott	Shahmer Scott	Attorney-Client	Flash Panthea	Shahmer Scott					Memorandum providing information to counsel for the purpose of receiving legal advice regarding preparation/review of internal guidance concerning practice management or IDJ support.
JANSEN-BP-01-00018			Withheld	pdf	Shahmer Scott	Shahmer Scott	Attorney-Client	Flash Panthea	Shahmer Scott					Memorandum providing information to counsel for the purpose of receiving legal advice regarding preparation/review of internal guidance concerning practice management or IDJ support.

Protected Document Subject to Protective Order

Protected Document Subject to Protective Order

3 of 13

4 of 13

Privilege Log Number	Start Dates	End Dates	Withheld or Redacted	Redaction	Confidentiality	Privilege Type	Author	Last Author	To	From	CC	BCC	Permissible	Purpose and Subject of Communication
JANSENBHO-PJ-000055			Withheld	Withheld	Heckman Matt	Attorney-Client	Heckman Matt	Heckman Matt	Heckman Matt; Henry John	Henry John				[Email Chain reflecting legal advice regarding preparation/review of customer-facing practice management or ID support material.]
JANSENBHO-PJ-000056			Withheld	Withheld	Heckman Matt	Attorney-Client	Heckman Matt	Heckman Matt;	Timothy; Folio Frank; Corneily	Corneily Kathryn	Corneily Thomas			[Email Chain collecting information relating to interactions or communications between ABS5 and
JANSENBHO-PJ-000057			Withheld	Withheld	Heckman Matt	Attorney-Client	Heckman Matt	Heckman Matt;	Timothy; Folio Frank; Corneily	Corneily Thomas	Corneily Thomas			[Email Chain collecting information relating to interactions or communications between ABS5 and
JANSENBHO-PJ-000058			Withheld	Withheld	Heckman Matt	Work Product	Wood Angela	Corneily Tom						[Email Chain reflecting legal advice regarding preparation/review of internal
JANSENBHO-PJ-000059			Withheld	Withheld	Heckman Matt	Attorney-Client	Heckman Matt	Heckman Matt;	Timothy; Folio Frank; Corneily	Corneily Kathryn	Corneily Thomas			[Email Chain reflecting legal advice regarding preparation/review of internal
JANSENBHO-PJ-000060			Withheld	Withheld	Heckman Matt	Work Product	Wood Angela	Corneily Tom						[Email Chain reflecting legal advice regarding preparation/review of internal
JANSENBHO-PJ-000061			Withheld	Withheld	Heckman Matt	Attorney-Client	Heckman Matt	Heckman Matt;	Timothy; Folio Frank; Corneily	Corneily Kathryn	Corneily Thomas			[Email Chain reflecting legal advice regarding preparation/review of internal
JANSENBHO-PJ-000062			Withheld	Withheld	Heckman Matt	Work Product	Burney Camille	Todd Daryl Eng						[Email Chain reflecting legal advice regarding preparation/review of internal
JANSENBHO-PJ-000063			Withheld	Withheld	Heckman Matt; White	Attorney-Client	Scott	Scott	Heckman Matt; White	Scott	Farnsworth Veronica			[Email Chain with attachment(s) reflecting legal advice regarding preparation/review of internal
JANSENBHO-PJ-000064			Withheld	Withheld	Heckman Matt; White	Work Product	Scott	Scott	Heckman Matt; White	Scott	Farnsworth Veronica			[Email Chain with attachment(s) reflecting legal advice regarding preparation/review of internal
JANSENBHO-PJ-000065			Withheld	Withheld	Heckman Matt	Attorney-Client	Heckman Matt	Heckman Matt;	Timothy; Folio Frank; Corneily	Corneily Kathryn	Corneily Thomas			[Email Chain with attachment(s) reflecting legal advice regarding preparation/review of internal
JANSENBHO-PJ-000066			Withheld	Withheld	Heckman Matt	Attorney-Client	Heckman Matt	Heckman Matt;	Timothy; Folio Frank; Corneily	Corneily Kathryn	Corneily Thomas			[Email Chain with attachment(s) reflecting legal advice regarding preparation/review of internal
JANSENBHO-PJ-000067			Withheld	Withheld	Heckman Matt	Attorney-Client	Heckman Matt	Heckman Matt;	Timothy; Folio Frank; Corneily	Corneily Kathryn	Corneily Thomas			[Email Chain with attachment(s) reflecting legal advice regarding preparation/review of internal
JANSENBHO-PJ-000068			Withheld	Withheld	Heckman Matt	Attorney-Client	Heckman Matt	Heckman Matt;	Timothy; Folio Frank; Corneily	Corneily Kathryn	Corneily Thomas			[Email Chain with attachment(s) reflecting legal advice regarding preparation/review of internal
JANSENBHO-PJ-000069			Withheld	Withheld	Heckman Matt	Attorney-Client	Heckman Matt	Heckman Matt;	Timothy; Folio Frank; Corneily	Corneily Kathryn	Corneily Thomas			[Email Chain with attachment(s) reflecting legal advice regarding preparation/review of internal
JANSENBHO-PJ-000070			Withheld	Withheld	Heckman Matt	Attorney-Client	Heckman Matt	Heckman Matt;	Timothy; Folio Frank; Corneily	Corneily Kathryn	Corneily Thomas			[Email Chain with attachment(s) reflecting legal advice regarding preparation/review of internal
JANSENBHO-PJ-000071			Withheld	Withheld	Heckman Matt	Attorney-Client	Heckman Matt	Heckman Matt;	Timothy; Folio Frank; Corneily	Corneily Kathryn	Corneily Thomas			[Email Chain with attachment(s) reflecting legal advice regarding preparation/review of internal





Protected Document Subject to Protective Order



8 of 13

9 of 13

10 of 13

ET 10 11

Protections Log Number	Start Dates	End Dates	Withheld or Redacted	Redaction	Content/Subject	Author	Privilege Type	Category	Author	To	From	CC	BCC	Permit/Date	Purpose and Subject of Communication
JANSEN-BIO-PJ-0000158			Withheld			Trishan Karen	Work Product	Attorney-Client	Guliana Teresa					5/29/2007	
JANSEN-BIO-PJ-0000159			Withheld			Trishan Karen	Work Product	Attorney-Client	Aileen Bill					5/29/2007	
JANSEN-BIO-PJ-0000160			Withheld			Trishan Karen	Work Product	Attorney-Client	Biddle Darrah					10/25/2010	Memorandum providing information to counsel for the purpose of receiving legal advice regarding preparation/review of internal guidance concerning practice management or ICI support.
JANSEN-BIO-PJ-0000161			Withheld			Trishan Karen	Work Product	Attorney-Client	Walls, Michelle;					3/18/2011	Final with attachments) providing information to counsel for the purpose of receiving legal advice regarding preparation/review of internal guidance concerning practice management or ICI support.
JANSEN-BIO-PJ-0000162			Redacted			Trishan Karen	Work Product	Attorney-Client	King Roger					8/6/2007	Final with attachments) reflecting legal advice regarding issues relating to lawfulness of practice management or ICI support.
JANSEN-BIO-PJ-0000163			Redacted			Trishan Karen	Work Product	Attorney-Client	Saher Daniel					8/6/2007	Permitation providing information to counsel for the purpose of receiving legal advice regarding issues relating to lawfulness of practice management or ICI support.
JANSEN-BIO-PJ-0000164			Redacted			Trishan Karen	Work Product	Attorney-Client	Trishan Karen					5/20/2011	Memorandum reflecting legal advice regarding preparation/review of internal guidance concerning practice management or ICI support.
JANSEN-BIO-PJ-0000165			Redacted			Trishan Karen	Work Product	Attorney-Client	Trishan Karen					5/20/2011	Memorandum reflecting legal advice regarding preparation/review of internal guidance concerning practice management or ICI support.
JANSEN-BIO-PJ-0000166			Redacted			Trishan Karen	Work Product	Attorney-Client	Trishan Karen					5/20/2011	Memorandum reflecting legal advice regarding preparation/review of internal guidance concerning practice management or ICI support.
JANSEN-BIO-PJ-0000167			Redacted			Trishan Karen	Work Product	Attorney-Client	Trishan Karen					5/20/2011	Memorandum reflecting legal advice regarding preparation/review of internal guidance concerning practice management or ICI support.
JANSEN-BIO-PJ-0000168			Redacted			Trishan Karen	Work Product	Attorney-Client	Trishan Karen					5/20/2011	Memorandum reflecting legal advice regarding preparation/review of internal guidance concerning practice management or ICI support.
JANSEN-BIO-PJ-0000169			Redacted			Trishan Karen	Work Product	Attorney-Client	Trishan Karen					5/20/2011	Memorandum reflecting legal advice regarding preparation/review of internal guidance concerning practice management or ICI support.
JANSEN-BIO-PJ-0000170			Redacted			Trishan Karen	Work Product	Attorney-Client	Trishan Karen					5/20/2011	Memorandum reflecting legal advice regarding preparation/review of internal guidance concerning practice management or ICI support.
JANSEN-BIO-PJ-0000171			Redacted			Trishan Karen	Work Product	Attorney-Client	Trishan Karen					5/20/2011	Memorandum reflecting legal advice regarding preparation/review of internal guidance concerning practice management or ICI support.
JANSEN-BIO-PJ-0000172			Redacted			Trishan Karen	Work Product	Attorney-Client	Trishan Karen					5/20/2011	Memorandum reflecting legal advice regarding preparation/review of internal guidance concerning practice management or ICI support.
JANSEN-BIO-PJ-0000173			Redacted			Trishan Karen	Work Product	Attorney-Client	Trishan Karen					5/20/2011	Memorandum reflecting legal advice regarding preparation/review of internal guidance concerning practice management or ICI support.
JANSEN-BIO-PJ-0000174			Redacted			Trishan Karen	Work Product	Attorney-Client	Trishan Karen					5/20/2011	Memorandum reflecting legal advice regarding preparation/review of internal guidance concerning practice management or ICI support.
JANSEN-BIO-PJ-0000175			Redacted			Trishan Karen	Work Product	Attorney-Client	Trishan Karen					5/20/2011	Memorandum reflecting legal advice regarding preparation/review of internal guidance concerning practice management or ICI support.
JANSEN-BIO-PJ-0000176			Redacted			Trishan Karen	Work Product	Attorney-Client	Trishan Karen					5/20/2011	Memorandum reflecting legal advice regarding preparation/review of internal guidance concerning practice management or ICI support.
JANSEN-BIO-PJ-0000177			Redacted			Trishan Karen	Work Product	Attorney-Client	Trishan Karen					5/20/2011	Memorandum reflecting legal advice regarding preparation/review of internal guidance concerning practice management or ICI support.
JANSEN-BIO-PJ-0000178			Redacted			Trishan Karen	Work Product	Attorney-Client	Trishan Karen					5/20/2011	Memorandum reflecting legal advice regarding preparation/review of internal guidance concerning practice management or ICI support.
JANSEN-BIO-PJ-0000179			Redacted			Trishan Karen	Work Product	Attorney-Client	Trishan Karen					5/20/2011	Memorandum reflecting legal advice regarding preparation/review of internal guidance concerning practice management or ICI support.
JANSEN-BIO-PJ-0000180			Redacted			Trishan Karen	Work Product	Attorney-Client	Trishan Karen					5/20/2011	Memorandum reflecting legal advice regarding preparation/review of internal guidance concerning practice management or ICI support.

Protected Document Subject to Protective Order

[illegible]

ET JP ET

Privilege Log Number	Start Dates	End Dates	Withheld or Redacted	Redaction Extension	Code/Rule/Type	Author	Last Author	All Participants	To	From	CC	BCC	Parent/Child	Purpose and Subject of Communication
JANSENIBIO-PJ-0000212			Withheld	N/A	Janssen Biotech Inc.	Attorney-Client							4/17/2007	Document providing information to counsel for the purpose of receiving legal advice regarding issues relating to lawfulness of practice management or KPI support services.
JANSENIBIO-PJ-0000213			Withheld	N/A	Janssen Biotech Inc.	Attorney-Client							4/17/2007	Document providing information to counsel for the purpose of receiving legal advice regarding issues relating to lawfulness of practice management or KPI support services.
JANSENIBIO-PJ-0000214			Withheld	N/A	Janssen Biotech Inc.	Attorney-Client							4/17/2007	Document providing information to counsel for the purpose of receiving legal advice regarding issues relating to lawfulness of practice management or KPI support services.
JANSENIBIO-PJ-0000215			Withheld	N/A	Janssen Biotech Inc.	Attorney-Client							4/17/2007	Document providing information to counsel for the purpose of receiving legal advice regarding issues relating to lawfulness of practice management or KPI support services.
JANSENIBIO-PJ-0000216			Withheld	N/A	Janssen Biotech Inc.	Attorney-Client							4/17/2007	Document providing information to counsel for the purpose of receiving legal advice regarding issues relating to lawfulness of practice management or KPI support services.
JANSENIBIO-PJ-0000217			Withheld	N/A	Janssen Biotech Inc.	Attorney-Client							4/17/2007	Document providing information to counsel for the purpose of receiving legal advice regarding issues relating to lawfulness of practice management or KPI support services.
JANSENIBIO-PJ-0000218			Withheld	N/A	Janssen Biotech Inc.	Attorney-Client							4/17/2007	Document providing information to counsel for the purpose of receiving legal advice regarding issues relating to lawfulness of practice management or KPI support services.
JANSENIBIO-PJ-0000219			Withheld	N/A	Janssen Biotech Inc.	Attorney-Client							4/17/2007	Document providing information to counsel for the purpose of receiving legal advice regarding issues relating to lawfulness of practice management or KPI support services.
JANSENIBIO-PJ-0000220			Withheld	N/A	Janssen Biotech Inc.	Attorney-Client							4/17/2007	Document providing information to counsel for the purpose of receiving legal advice regarding issues relating to lawfulness of practice management or KPI support services.